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5 *Attorney for Plaintiff Jeffrey Alan James*

6  
7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

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10 JEFFREY ALAN JAMES, an individual and  
11 resident of Nevada,

12 Plaintiff,

13 v.

14 CITY OF HENDERSON, a municipal  
corporation, DETECTIVE K. LAPEER  
15 (#1446), DETECTIVE K. LIPPISCH (#1710),  
DETECTIVE W. NICHOLS (#1242), and  
16 Defendant DOE OFFICERS I-X, inclusive,

17 Defendants.  
18

Case No. 2:19-cv-01207-JCM-BNW

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
RESPONSE TO MOTION TO  
DISMISS [ECF No. 5] DUE TO  
PENDING MOTION TO WITHDRAW  
AS COUNSEL OF RECORD FOR  
PLAINTIFF**

**(Fourth Request)**

19 Counsel for Plaintiff, Melanie A. Hill of Melanie Hill Law PLLC, and counsel for  
20 Defendants, Brandon P. Kemble, Assistant City Attorney for the Henderson City Attorneys' Office,  
21 respectfully submit the following stipulation and order to extend the deadline for Plaintiff to file his  
22 opposition to the Defendants City of Henderson, Detective K. Lapeer, Detective K. Lippisch, and  
23 Detective W. Nichols' Motion to Dismiss [ECF No. 5] filed on July 18, 2019 for sixty days from the  
24 current deadline of December 2, 2019 to January 31, 2020.

25 Due to constant lock down at the jail, counsel for Plaintiff has not heard from the Plaintiff  
26 regarding what attorney he would like to substitute in her place in this case. Counsel for Plaintiff  
27 has also received no communications from Mr. James' family members regarding the status of him  
28 finding new counsel. Counsel for Plaintiff is also not able to communicate with Plaintiff because the

1 jail is constantly on lock down and therefore Counsel for Plaintiff filed a Motion to Withdraw as  
2 counsel of record on December 2, 2019. To avoid any prejudice to Plaintiff due to counsel's  
3 withdrawal, the parties have stipulated to extend the deadline for Plaintiff to prepare and file his  
4 opposition to the Defendants' Motion to Dismiss [ECF No 5].

5 **IT IS HEREBY STIPULATED AND AGREED** between the parties that the deadline for  
6 Plaintiff to file his opposition to the Defendants' Motion to Dismiss [ECF No 5] be extended sixty  
7 days from its current deadline of December 2, 2019 to January 31, 2020 to allow the Court to rule on  
8 counsel for Plaintiff's pending motion to withdraw and also allow Plaintiff adequate time to oppose  
9 Defendants' Motion to Dismiss.

10 DATED this 2nd day of December, 2019.

11 MELANIE HILL LAW PLLC

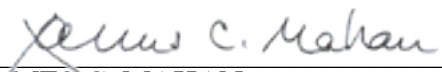
HENDERSON CITY ATTORNEY

12  
13 By: /s/ Melanie A. Hill  
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*Attorneys for Defendants*

18 **IT IS SO ORDERED.**

19 Dated December 3, 2019.

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23   
24 JAMES C. MAHAN  
25 UNITED STATES DISTRICT JUDGE  
26  
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